



Sara Morris
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Via Electronic Filing

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Notice of *Ex Parte* Communication in MB Docket No. 18-349 (2018
Quadrennial Regulatory Review – Review of the Commission’s Broadcast
Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the
Telecommunications Act of 1996)**

Dear Ms. Dortch:

On June 19, 2019, Sara Morris, Senior Director, Government Affairs, iHeartCommunications, Inc. (together with iHeartMedia + Entertainment, Inc., “iHeart”), met with Michael Scurato, Acting Legal Advisor for Media and Consumer Protection to Commissioner Geoffrey Starks, to discuss iHeart’s positions in the above-referenced docket.

Ms. Morris discussed iHeart’s view that the Commission pursue strategic, targeted deregulation of its radio ownership limits, in contrast to the extremely aggressive approach sought by the National Association of Broadcasters in this proceeding. In particular, Ms. Morris highlighted iHeart’s concern that NAB’s proposed elimination or relaxation of local limits on FM station ownership would threaten significantly valuation of and investment in AM radio properties, further weakening an already-challenged AM band and the millions of listeners who continue to rely on these stations for entertainment, sports and – especially – local emergency information. On the latter point, Ms. Morris noted the Federal Emergency Management Agency’s reliance on AM radio stations as a critical component of its nationwide public safety and national security emergency communications infrastructure. Finally, Ms. Morris noted that across-the-board relaxation or elimination of local FM limits would eliminate the very incentive – *i.e.*, the ability of an incubating broadcaster to obtain a waiver of the local FM station limits – that the Commission itself deems essential to attract broadcasters to participate in its now-underway Diversity Incubator Program.

Respectfully submitted,

Sara Morris
Sr. Director, Government Affairs

cc: Michael Scurato, Commissioner Starks